01-0604

Corporate Environmental Programs
General Electric Company
100 Woodlawn Avenue, Pittsfield, MA 01201

SDMS 44803

Transmitted via Facsimile and Overnight Courier

July 7, 2003

Bryan Olson
EPA Project Coordinator
Office of Site Remediation and Restoration
U.S. Environmental Protection Agency
One Congress Street, Suite 1100
Boston, MA 02114-2023

Re: GE-Pittsfield/Housatonic River Site
East Street Area 1-North (GECD130)
Proposal for Supplemental VOC Sampling

Dear Mr. Olson:

In April 2003, the General Electric Company (GE) submitted to the U.S. Environmental Protection Agency (EPA) a document titled *Pre-Design Investigation Report for the East Street Area 1-North Removal Action Area* (PDI Report). That document summarized the activities performed and results obtained as part of pre-design investigations at the East Street Area 1-North Removal Action Area (RAA), as well as other existing data that will be incorporated into future Removal Design/Removal Action (RD/RA) evaluations for this RAA. In addition, the PDI Report proposed certain supplemental investigations to obtain additional data for the RD/RA evaluations.

In a letter dated June 20, 2003, EPA provided conditional approval of the PDI Report. Condition No. 3 of EPA's letter required that GE evaluate the need for additional soil sampling for volatile organic compounds (VOCs) due to elevated analytical detection limits for certain pre-design VOC soil samples collected at location RAA6-C6. To address that condition, GE has performed a preliminary evaluation of the soil data for VOCs within the GE-owned portion of this RAA (which constitutes a single averaging area), considering the procedures specified in the *Statement of Work for Removal Actions Outside the River* (SOW). Based on this preliminary evaluation, GE is proposing to conduct supplemental VOC soil sampling to further evaluate the occurrence of the elevated analytical detection limits.

In its preliminary evaluation, GE determined that, for a number of VOCs, there were certain soil sample results in which the VOCs were not detected but which had elevated detection limits such that one-half the detection limits exceeded the applicable EPA Region 9 Preliminary Remediation Goals (PRGs) for such constituents in soil in industrial areas. These constituents included several for which there are no Method 1 soil standards in the Massachusetts Contingency Plan (MCP).

At this point, the cause(s) for the elevated analytical detection limits for these sample results (e.g., interference from other constituents, analytical procedures/methodologies, and/or the soil matrix itself) are unknown. To further assess this issue and to evaluate whether lower analytical detection limits can be attained, GE proposes to collect supplemental soil samples for VOC analysis from sample location RAA6-C6, where elevated detection limits were reported. Specifically, two additional soil samples will be collected from that sample location, at the 0- to 1-foot and 6- to 8-foot depth increments, as illustrated

on attached Figure 1. All sampling and analysis will be completed in accordance with GE's approved *Field Sampling Plan/Quality Assurance Program Plan* (FSP/QAPP). The laboratory will be specifically instructed to make every effort to achieve the Practical Quantitation Limits (PQLs) for VOCs (listed in Table 3 of the FSP/QAPP) for these samples, to the extent feasible.

The analytical results from these sampling activities will be evaluated to determine an appropriate course of action. This evaluation will be presented in the Conceptual RD/RA Work Plan for this RAA. For example, if these analyses are able to achieve lower detection limits and the constituents are not detected (or are below the applicable PRGs), GE may propose to eliminate the constituents from further evaluation. If the analyses achieve lower detection limits and certain constituents are detected above the PRGs, those results will be incorporated into the RD/RA evaluations. On the other hand, if the results indicate that it is not possible to achieve significantly lower analytical detection limits and the results are still non-detect, GE may propose to eliminate those non-detect constituents from further RD/RA evaluations on the ground that the constituents were not detected using the lowest analytical detection limits that can feasibly be achieved in the circumstances. Other outcomes or combinations of outcomes are also possible.

Upon EPA approval of the supplemental VOC soil sampling and analysis proposed in this letter, GE will initiate field activities (including the other supplemental soil sampling and analysis proposed in the PDI Report). As available, results will be provided in the Monthly CD Status Report that follows receipt of those results. Please contact John Novotny or me with any questions.

Sincerely,

Andrew T. Silfer /NME

Andrew T. Silfer, P.E.
GE Project Coordinator

Attachment
V:\GE_Pittsfield_CD_ESA_1_North\Correspondence\47732196.doc

cc: M. Nalipinski, EPA
T. Conway, EPA
H. Inglis, EPA
R. Howell, EPA
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J. Bieke, Shea & Gardner
Public Information Repositories
GE Internal Repositories

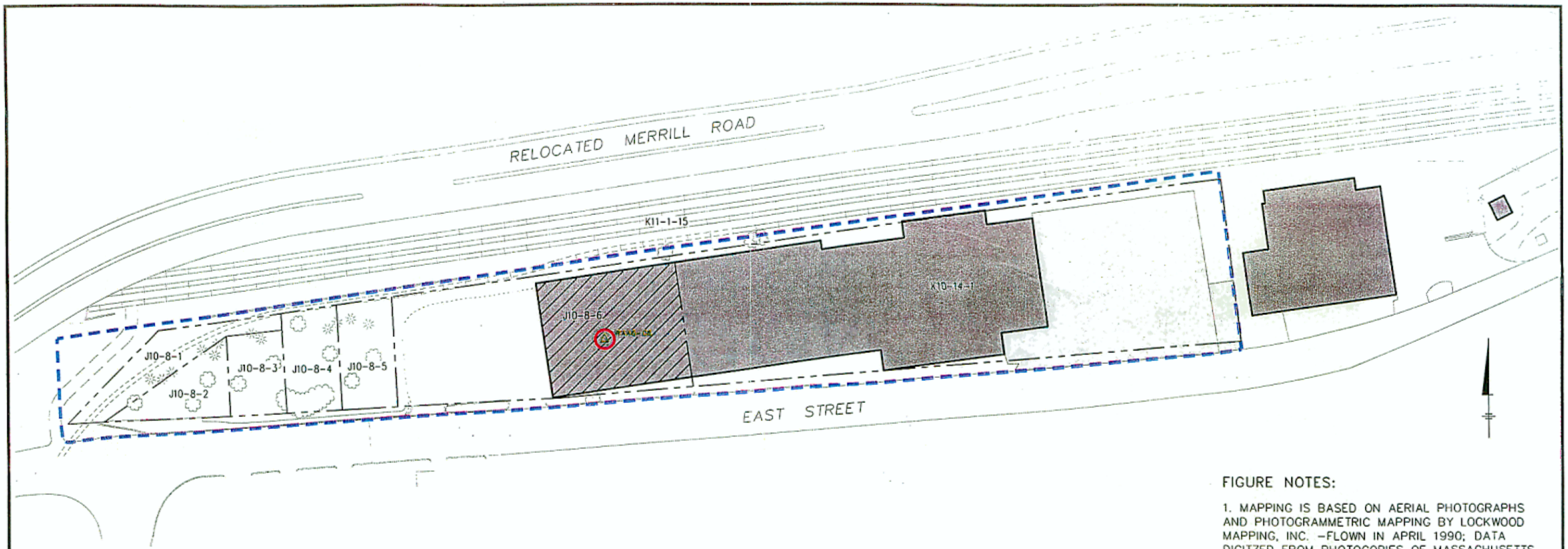

FIGURE NOTES:

1. MAPPING IS BASED ON AERIAL PHOTOGRAPHS AND PHOTOGRAMMETRIC MAPPING BY LOCKWOOD MAPPING, INC. –FLOWN IN APRIL 1990; DATA DIGITZED FROM PHOTOCOPIES OF MASSACHUSETTS HIGHWAY DEPARTMENT DRAWINGS DEPICTING MERRILL ROAD REALIGNMENT, 1/14/98; AND SURVEY INFORMATION PROVIDED BY WHITE ENGINEERING DEPICTING RELOCATED EAST STREET, 5/7/01.

2. ALL LOCATIONS ARE APPROXIMATE.

3. NOT ALL PHYSICAL FEATURES SHOWN.

LEGEND:

- APPROXIMATE REMOVAL ACTION AREA BOUNDARY
- FENCE
- PROPERTY LINE (APPROXIMATE)
- BUILDING
- BUILDING 69 TO BE DEMOLISHED
- PAVED AREA
- △ RAA6-C6 PROPOSED 0– TO 1–FOOT SOIL SAMPLE LOCATION (VOCs ONLY)
- PROPOSED 6– TO 8–FOOT SOIL SAMPLE LOCATION (VOCs ONLY)

0 100' 200'

GRAPHIC SCALE

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
PROPOSAL FOR SUPPLEMENTAL VOC SOIL INVESTIGATIONS

PROPOSED SUPPLEMENTAL VOC SOIL CHARACTERIZATION SAMPLE LOCATION

BBL BLASLAND, BOUCK & LEE, INC. engineers & scientists

FIGURE 1

X: 40189X01.DWG
L: ON=*, OFF=*REF*, IPRO-SOIL
P: PAGESET/PLT-BL
7/3/03 SYR-S4-DMW DMW DJP
N/40189023/40189808.DWG